

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>IN RE: Renardo Harvey</b>	)	
	)	<b>Case No: 16 B 09784</b>
	)	<b>Judge: Goldgar</b>
	)	<b>Chapter 13</b>
<b>Debtor</b>	)	

**NOTICE OF MOTION**

**Served upon the following parties electronically:**

**Office of United States Trustee**, Dirksen Federal Building, 219 S. Dearborn, St., Room 873, Chicago, IL 60604

**Trustee:** Marilyn O. Marshall, 224 S. Michigan Ste. 800, Chicago, IL 60604

**and served upon the following parties via U.S. Mail:**

**Debtor:** Renardo Harvey, 6852 S. Normal, Apt#1E, Chicago, IL 60621

**See Attached Service List**

PLEASE TAKE NOTICE that on August 27, 2019 at 9:30 a.m.,  
or as soon thereafter as I may be heard, I shall appear before the Honorable Judge  
Goldgar, or any other Bankruptcy Judge presiding in his place in Courtroom 642 of the  
Dirksen Federal Building, 219 S. Dearborn St., Chicago, Illinois, on the attached Motion  
to Modify Plan, and shall request that the attached Order be entered, at which time you  
may appear if so desired.

**PROOF OF SERVICE**

I, The undersigned, an attorney, hereby certify that a copy of this notice was served electronically or mailed to the above persons, at her respective addresses, postage prepaid, by depositing in the U.S. Mail at 211 W. Wacker Dr., Chicago, IL 60606, before 6:00 p.m. on or before August 6, 2019.

/s/ Angelica Harb  
Angelica Harb  
Law Office of Jason Blust, LLC  
211 W. Wacker Dr., Ste. 300  
Chicago, IL 60606  
312-273-5001

Label Matrix for local noticing  
0752-1  
Case 16-09784  
Northern District of Illinois  
Eastern Division  
Tue Aug 6 17:36:13 CDT 2019

Total Finance AC LLC  
2900 W. Irving Park Road  
Chicago, IL 60618-3562

U.S. Bankruptcy Court  
Eastern Division  
219 S Dearborn  
7th Floor  
Chicago, IL 60604-1702

City of Chicago  
Dept of Finance  
PO Box 88292  
Chicago, IL 60680-1292

City of Chicago Department of Finance  
c/o Arnold Scott Harris P.C.  
111 W. Jackson Blvd Ste.600  
Chicago IL. 60604-3517

Debt Recovery Solution  
Attention: Bankruptcy  
900 Merchants Concourse Ste L111  
Westbury, NY 11590-5121

ER Solutions/Convergent Outsourcing, INC  
Po Box 9004  
Renton, WA 98057-9004

Go Financial  
7465 E Hampton Ave  
Mesa, AZ 85209-3328

Quantum3 Group LLC as agent for  
Credit Corp Solutions Inc  
PO Box 788  
Kirkland, WA 98083-0788

(p)TOTAL FINANCE AC LLC  
3400 N PULASKI ROAD  
CHICAGO IL 60641-4023

Total Finance AC, LLC  
3400 North Pulaski Road  
Chicago, Illinois 60641-4023

Ttl Fin Ac  
2900 West Irving P  
Chicago, IL 60618

U S Dept Of Ed/fisl/at  
Attn: Bankruptcy  
61 Forsythe St Room 19t89  
Atlanta, GA 30303-8928

U.S. DEPARTMENT OF EDUCATION  
PO BOX 16448  
St. Paul, MN 55116-0448

Us Dept Of Education  
Attn: Bankruptcy  
Po Box 16448  
Saint Paul, MN 55116-0448

Jason Blust  
Law Office of Jason Blust, LLC  
211 W. Wacker Drive  
Ste. 300  
Chicago, IL 60606-1390

Marilyn O Marshall  
224 South Michigan Ste 800  
Chicago, IL 60604-2503

Michelle K Hinds  
Hinds Law LLC  
211 W. Wacker Drive  
Ste. 321  
Chicago, IL 60606-1217

Patrick S Layng  
Office of the U.S. Trustee, Region 11  
219 S Dearborn St  
Room 873  
Chicago, IL 60604-2027

Renardo C Harvey  
3400 N Pulaski Rd  
Chicago, IL 60641-4023

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Total Finance  
3015 West Irving Park Road  
Chicago, IL 60618

End of Label Matrix  
Mailable recipients 19  
Bypassed recipients 0  
Total 19

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**IN RE: Renardo Harvey**

**Debtor**

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**Case No: 16 B 09784**

**Judge: Goldgar**

**Chapter 13**

**MOTION TO MODIFY PLAN**

Now comes Renardo Harvey (hereinafter referred to as “Debtor”), by and through his attorneys, and moves this Honorable Court for entry of an Order Modifying Plan, pursuant to section 1329 of the bankruptcy code, and in support thereof, respectfully represents as follows:

1. On March 22, 2016, the Debtor filed a petition for relief under Chapter 13 of the Bankruptcy Code.

2. This Honorable Court confirmed the Debtor’s Chapter 13 plan on May 17 2016. The confirmed plan called for payments of \$320.00 for 60 months, paying unsecured creditors 6% on their claims.

3. The Debtor filed his 2018 tax return and expects a refund of \$899.00. Debtor’s counsel E-mailed a copy of the 2018 tax return to the Trustee’s office on August 1, 2019. The trustee’s office now allows debtors to retain \$1200.00 of their tax refund. The Debtor has not yet received his refund of \$899.00 since his taxes were filed a few weeks late. The Debtor is expected to receive less than the allotted \$1200.00 refund amount, and so he is requesting to keep the refund in full of \$899.00. Debtor intends to use his refund to pay a portion to his tax preparer and the remaining on back rent owed.

4. The Debtor respectfully requests to keep his tax refund in the amount of \$899.00. Debtor requests to amend section G of the Chapter 13 plan to state, “On or

before April 20<sup>th</sup>, 2019 and each year thereafter, the Debtor shall submit a copy of the prior year's filed federal tax return to the Chapter 13 Trustee. The Debtor shall tender the amount of any tax refund received while the case is pending in excess of \$1200.00 to the Trustee. The tax refunds shall be treated as additional payments into the plan and must be submitted within 7 days of receipt of each such refunds by the Debtor."

**WHEREFORE**, Debtor prays that this Honorable Court enter an Order for the following relief:

1. Permitting the Debtor to keep his 2018 refund;
2. Amending Section G of the plan to add tax return and refund language;  
and
3. For such other relief as this Court deems proper under the circumstances.

Respectfully submitted,

/s/ Angelica Harb  
Angelica M. Harb  
Law Office of Jason Blust, LLC  
211 W. Wacker Dr., Ste. 300  
Chicago, IL 60606  
312-273-5001